

Concerning Broadband Power Line (BPL) technology.

I am an amateur radio operator of more than 16 years, licensed as N0iMD since 1987. I am also a member of the Amateur Radio Relay League.

I am familiar with interference caused by Part 15 devices to my licensed amateur communications. Some interference problems I've encountered are extremely difficult to resolve even when I own both the Part 15 device and the interfered with receiver. I have resorted to turning off one device or the other, depending upon which one is needed most at that time. Unfortunately, BPL offers interference opportunities with a third, very often unresponsive, party.

Please refer to the American Radio Relay League (ARRL) comments concerning simple power line interference cases:

"Power line noise is the single most frequently identified source of HF interference to licensed Amateur Radio operators."

Of the power line interference cases tracked by the ARRL, many are unresolved as power companies are unresponsive to the existing FCC regulations.

I ask, what will cause a change in the power company's responsiveness to interference issues should BPL be permitted?

The ARRL has further stated:

"Entire communities will be affected by radiated BPL emissions, and it can easily be seen that interference to Amateur Radio stations will, as a practical matter, not be resolved where the solution is to cease operation of a BPL system in a community. In situations where an Amateur station creates interference to an access BPL system, the level of tolerance of broadband consumers to that interference will be extremely low indeed. So, irrespective of the Part 15 status of BPL, incidents of interaction between the Amateur Service and BPL systems on HF frequencies can be expected to be resolved (in the unlikely event that they could be resolved at all), to the unilateral detriment of Amateur Radio operators."

The ARRL suggests that the solution to an Amateur to BPL interference is "to the detriment of amateur radio operators." I can only guess what this means; the amateur ceases lawful, licensed operations, modification to the amateur's license, or modifications to the amateur service?

Any of these scenarios is completely unacceptable and contrary to existing Part 15 regulations which require, "(1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."

Furthermore, the ARRL concludes:

The "ARRL has, upon diligent and exhaustive research, concluded that all Amateur medium-frequency (MF, i.e. 1.8-2.0 MHz), all HF, and all VHF allocations must be avoided by any access or in-building BPL system, without exception."

The power companies are certain that the amateur service (and other radio services) won't be affected by gross interference to our often weak signal operations. If the FCC is willing to believe these claims, I suggest the relocation of BPL to the following spectrum: 108 - 135 MHz, and 230 - 400 MHz.

After all, the desired BPL communications will be contained entirely within the power company's hardware.

Respectfully,
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